

EXHIBIT 8

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
) Case No.
vs.) 3:17-cv-000939-WHA
)
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO LLC; OTTO TRUCKING,)
INC.,)
)
Defendants.)
)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF ZACHARY MORRISS

San Francisco, California

Wednesday, July 26, 2017

Volume I

Reported by:

CARLA SOARES
CSR No. 5908
Job No. 2661294

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1 BY MS. CHANG:

11:39:29

2 Q Do you know of any other engineers that
3 have taken PCBs home?

4 A I don't know specifically.

5 Q Do you take pictures of LiDAR prototypes
6 or parts of LiDARs with your smartphone?

11:39:51

7 A Yes.

8 Q For work purposes?

9 A Yes.

10 Q And is that on your personal smartphone?

11:40:06

11 A Yes.

12 Q Is your personal smartphone synched with
13 some cloud service?

14 A Yes.

15 Q Are there Waymo policies regarding the use
16 of personal devices for work purposes?

11:40:18

17 A Insomuch as they pay for cell phone bills
18 and stuff like that, yes, there are policies around
19 that. I'm not familiar with all of the policies.

20 Q Does Waymo pay for your personal cell
21 phone bill?

11:40:44

22 A No.

23 Q But you use your personal cell phone for
24 work purposes?

25 A Yes. It is my only cell phone.

11:40:49

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1 Q Do you e-mail Waymo documents to your
2 personal e-mail account?

11:40:56

3 A I can think of very few documents from
4 Waymo that I've e-mailed to my personal account.

5 Q Do those include confidential documents?

11:41:09

6 MR. SCHMIDT: Objection to form.

7 THE WITNESS: I believe one of them
8 includes my initial offer letter, for example, which
9 I do believe could be considered a confidential
10 document. I'm not sure how it's designated, quite
11 frankly.

11:41:23

12 BY MS. CHANG:

13 Q What about technical confidential
14 documents? Have you ever e-mailed any of those to
15 your personal e-mail?

11:41:33

16 MR. SCHMIDT: Objection to form.

17 THE WITNESS: The only technical
18 personal -- sorry. The only technical documents
19 that I believe I've e-mailed to my personal account
20 are models for printing at home for work purposes.
21 Because I own a 3D printer at home, and so sometimes
22 I e-mail to my @Gmail account, keeping it all within
23 the Google system, in order to transfer those files.

11:41:44

24 BY MS. CHANG:

25 Q Do you share confidential Google documents

11:42:01

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
a true record of the testimony given.

11 Further, that if the foregoing pertains to
12 the original transcript of a deposition in a Federal
13 Case, before completion of the proceedings, review
of the transcript [] was [] was not requested.

14 I further certify I am neither financially
15 interested in the action nor a relative or employee
of any attorney or any party to this action.

16 IN WITNESS WHEREOF, I have this date
17 subscribed my name.

18
19 Dated: July 27, 2017

20
21
22
23 Carla Soares

24 CARLA SOARES

25 CSR No. 5908